

APPLICATION NO. 09/844,717  
ATTORNEY DOCKET NO. 58146988.714

### REMARKS

Reconsideration of this application is respectfully requested in light of the above amendments and the following remarks. Claims 1-14 are pending in the application. Claims 1 and 8 have been amended, and claims 2-7 and 9-14 have been maintained in their previous form.

#### I. REJECTIONS UNDER 35 U.S.C. § 103

Claims 1 and 8 were rejected under 35 U.S.C. § 103 as allegedly being unpatentable over U.S. Patent No. 5,355,474 to Thuraingham et al. in view of U.S. Patent No. 5,675,785 to Hall et al. These rejections are moot, as claims 1 and 8 have been amended.

Claims 1 and 8 have been amended to further define the dimensional database as claimed to have, in addition to dimension tables and fact tables, *metadata* describing the fact tables; specifically, the claims have been clarified with respect to the security level for the at least one fact *being stored as metadata in the database*. The Thuraingham and Hall references cannot be applied to reject the amended independent claims under 35 USC § 103, which provides:

A patent may not be obtained . . . if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which the subject matter pertains . . . (emphasis added)

Thus, when evaluating a claim for determining obviousness, all limitations of the claim must be evaluated. In this respect, neither Thuraingham nor Hall teaches or suggests "wherein the security level for the at least one fact is stored as metadata in the database" as recited in the independent claims.

As the Examiner has conceded, Thuraingham does not disclose fact level security. Consequently, Thuraingham cannot disclose fact level security being stored as metadata in the dimensional database. Further, Thuraingham fails to teach any security level being stored as metadata in the dimensional database. To the contrary, Thuraingham discloses a separate "metadatabase" distinct from the multilevel secure database management system, as shown in Figure 1.

REPLY TO NON-FINAL OFFICE ACTION  
DALDMS/562461.1

PAGE 8 OF 10

APPLICATION NO. 09/844,717  
ATTORNEY DOCKET NO. 68146988.714

The Examiner supplements *Thuraisingham* with Hall in asserting that Hall discloses providing different security levels for different summary and fact tables. Applicants respectfully disagree with this characterization of Hall and seek to further distinguish Hall by affirmatively claiming that the fact security level is stored as metadata in the dimensional database. Not only does Hall fail to disclose security levels being stored as metadata in the dimensional database, but Hall specifically teaches away from such an arrangement in disclosing that "security is managed by intelligent warehouse hub 23," which is outside of the disclosed data warehouse. *Hall*, col. 9, lines 26-29 and Figure 1.

Accordingly, Applicants respectfully submit that amended claims 1 and 8 are patentably distinct from the teachings of *Thuraisingham* and Hall, either alone or in combination. As claims 2-7 and 9-14 depend from and further limit independent claims 1 and 8, respectively, these claims are now in condition for allowance as well.


## II. CONCLUSION

Applicants respectfully submit that all pending claims are in condition for allowance, and therefore request a Notice of Allowability for claims 1-14. Because the three-month deadline for response expired on February 17, 2006, a petition requesting a one-month extension of time is included with this Reply. The Office is authorized to charge the \$120 fee for a one-month extension of time to Account No. 13-0480, Attorney Docket No. 68146988.714. In the event that further fees are required or an overpayment has occurred, the Office is authorized to charge or credit the above-referenced account. The Examiner is invited to please contact the undersigned Attorney of Record if such would expedite the prosecution of the present Application.

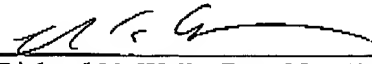
REPLY TO NON-FINAL OFFICE ACTION  
DALDMS/562461.1

PAGE 9 OF 10

APPLICATION NO. 09/844,717  
ATTORNEY DOCKET NO. 58146988.714

  
Respectfully submitted,

Date: March 16, 2006

  
Richard V. Wells, Reg. No. 53,757  
Baker & McKenzie LLP  
Attorney for Applicants  
(214) 978-3006 (telephone)  
(214) 978-3099 (fax)

REPLY TO NON-FINAL OFFICE ACTION  
DALDMS/562461.1

PAGE 10 OF 10